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* Also Admitted in District of Columbia

July 1, 2008

VIA HAND DELIVERY

The Honorable Charles L.A. Terreni Chief Clerk/Administrator Public Service Commission of South Carolina 101 Executive Center Drive, Suite 100 Columbia, South Carolina 29210

RE: South Carolina Electric and Gas Company – Combined Application for Certificate of Environmental Compatibility and Public Convenience and Necessity and for a Base Load Review Order

Docket No. 2008-196-E

Petition to Intervene of CMC Steel South Carolina

Dear Mr. Terreni:

Enclosed for filing please find the original and ten (10) copies of the Petition to Intervene of CMC Steel South Carolina in the above-referenced matter. I have also enclosed an extra copy of the petition and would appreciate you file stamping the extra copy and returning it to me via courier. By copy of this letter, I am serving all parties of record. If you have any questions or need additional information, please do not hesitate to contact me.

With kind regards, I am

Very truly yours,

E. Wade Mullins, III

1. Usa Mullon

cc: Belton T. Ziegler, Esquire (w/enc.)
Nanette S. Edwards, Esquire (w/enc.)
Shannon B. Hudson, Esquire (w/enc.)
K. Chad Burgess, Esquire (w/enc.)
Mitchell Willoughby, Esquire (w/enc.)

Leslie Minerd

Damon E. Xenopoulos, Esquire

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BEFORE THE SOUTH CAROLINA PUBLIC SERVICE COMMISSION

In RE:)	िहेन्द्री इंटर	r\	
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South Carolina Electric & Gas Company)	Docket No. 2008-196-	. <u>-</u>	17
- Combined Application for Certificate)	<u> </u>		<u></u>
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Public Convenience and Necessity and)			
for a Base Load Review Order	Ĵ			

PETITION TO INTERVENE OF CMC STEEL SOUTH CAROLINA

CMC Steel South Carolina ("CMC") hereby petitions to intervene in the abovecaptioned proceeding. CMC states the following grounds in support of its petition.

- Carolina. This facility utilizes an electric arc furnace ("EAF") to melt and recycle steel. This process requires CMC to purchase very large quantities of electricity from South Carolina Electric & Gas Company ("SCE&G") at a cost of millions of dollars a year. Because the cost of electricity is one of the major costs of steel-making utilizing an EAF, the cost of electric power directly affects CMC's ability to produce steel at a competitive price. CMC is one of the largest retail customers of SCE&G.
- 2) Due to the magnitude and unique characteristics of its load, CMC cannot be represented adequately by any other party to this proceeding. At this stage of the proceeding, CMC has not fully determined what positions it may take.
 - 3) CMC's mailing address is:

CMC Steel South Carolina 310 New State Road Cayce, SC 29033 4) CMC is represented by the Washington, D.C. law firm of Brickfield, Burchette, Ritts & Stone, P.C. in various matters regarding electric rates and service. In the past few years, attorneys of the firm have appeared before this Commission, the Federal Energy Regulatory Commission, and many other state utility commissions. In accordance with Rule 103-804 S.(1)(b) of the Commission's Rules of Practice and Procedure, Brickfield, Burchette, Ritts & Stone, P.C. will associate with E. Wade Mullins, III, Esq. and Joey R. Floyd, Esq. of Bruner, Powell, Robbins, Wall & Mullins, LLC, local counsel licensed to practice in South Carolina. An appropriate Motion for Admission Pro Hac Vice will be filed with the Commission. Service and correspondence regarding this proceeding should be sent to all of the undersigned.

WHEREFORE, for the reasons set forth above, CMC respectfully requests permission to intervene in this proceeding.

E. Wade Mullins, III, Esq.

Joey R. Floyd, Esq.

Bruner, Powell, Robbins, Wall & Mullins,

LLC

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Washington, D.C. 20007

(202) 342-0800

Attorneys for CMC Steel South Carolina

BEFORE THE SOUTH CAROLINA PUBLIC SERVICE COMMISSION

Docket No. 2008-196-E

In RE:)	
South Carolina Electric & Gas Company)	
 Combined Application for Certificate)	CERTIFICATE OF SERVICE
of Environmental Compatibility and)	
Public Convenience and Necessity and)	
for a Base Load Review Order)	

This is to certify that I have caused to be served this day a copy of the **Petition to** Intervene of CMC Steel South Carolina via hand delivery to the persons named below at the addresses set forth below:

Nanette S. Edwards, Counsel Office of Regulatory Staff 1441 Main Street, Suite 300 Columbia, SC, 29201 Email: nsedward@regstaff.sc.gov

Shannon Bowyer Hudson, Counsel

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Pope Zeigler, LLC Pope Zeigler, LLC Post Office Box 11509 Columbia, SC, 29211

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Leslie Minerd

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> <u>J. Wall Mullm</u> E. Wade Mullins, III, Esq.

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